

Pretreatment Compliance Audit

Summary Report

Discharger: Facility Name
NPDES Permit No. CAxxxxxxx
County

Location: Street address. If physical address and mailing address are different, list both and identify

Contact: List Primary contacts from the POTW that took part in the PCA by Name and Title

Audit Dates: Month, Day, Year

Audited By: List all participants and identify affiliation (State, EPA, Contractor)

Attachments

Attachment A Industrial User Site Visit Data Sheets
Attachment B Legal Authority Review Checklist
Attachment C Discharger Information: Industry X

I. Audit Summary

II. Program Description

III. Industrial User (IU) Characterization	
IUs currently identified by the Control Authority (CA)	IU Type
	Discharging Significant Industrial Users
	Discharging Non-Categorical SIUs (as defined by the CA)
	Categorical Industrial Users (CIUs)
	Middle Tier CIUs
	Zero-Discharging CIUs
	Non-significant CIU (NSCIU)
	Other Regulated IUs (e.g. permitted IUs) Describe: .
	Waste Haulers Describe:

IV. Findings Summary Table		
Part V Section Reference – Finding	Requirement(s)	Recommendation(s)

V. Evaluation

A. Control Authority (CA) Pretreatment Program Modification
1. When was the last program modification? Did the CA notify the EPA of program modifications? (40 CFR 403.18)
B. IU Characterization
1. Describe the CA's procedure for identifying and locating IUs that might be subject to the pretreatment program. Has the CA identified and located all applicable IUs (non-categorical SIUs, CIUs, NSCIUs, etc.)? (40 CFR 403.8(f)(2)(i))
2. Has the CA identified the character and volume of pollutants contributed to the publicly owned treatment works (POTW) by IUs subject to the pretreatment program? (40 CFR 403.8(f)(2)(ii))
3. Has the CA prepared and maintained a list of SIUs, as defined in 403.3(v)(1), along with the applicable SIU criteria? Does the list indicate whether the CA has made a determination that an SIU is a NSCIU, as defined in 403.3(v)(2), rather than an SIU? Have modifications to the list been submitted with annual reports? (40 CFR 403.8(f)(6))
C. Control Mechanism Evaluation
1. Has the CA issued individual or general control mechanisms to all SIUs? (40 CFR 403.8(f)(1)(iii))
2. Do the applications for general control mechanism contain all of the following? (40 CFR 403.8(f)(1)(iii)(A)(2))
<ul style="list-style-type: none"> a. Contact info b. Production processes c. Types of wastes generated d. Location for monitoring e. Any request for waiver for pollutants not present per 40 CFR 403.12(e)(2)
3. Are general control mechanisms only issued for IUs where all of the following is true? (40 CFR 403.8(f)(1)(iii)(A)(1))
<ul style="list-style-type: none"> a. Involve same/substantially similar types of operations b. Discharge the same type of waste

- c. Same effluent limitations
- d. Same or similar monitoring
- e. There are no CIU production-based standards, CIU mass limits, combined wastestream formula, or net/gross calculations

**4. Do both individual and general control mechanisms include the following, where applicable?
(40 C.F.R. §403.8(f)(1)(iii)(B))**

- a. Statement of duration (5 years max)
- b. Statement of non-transferability
- c. Applicable effluent limits (local limits, categorical standards, best management practices (BMPs))
- d. Self-monitoring requirements
 - Identification of pollutants to be monitored
 - Sampling frequency
 - Sampling locations/discharge points
 - Appropriate sample types
 - Reporting requirements
 - Record-keeping requirements
- e. Statement of applicable civil and criminal penalties
- f. Compliance schedules
- g. Notice of slug loading or potential problems at POTW
- h. Notification of spills, bypasses, upsets, etc.
- i. Notification of significant change in discharge
- j. 24-hour notification of effluent violation
- k. Submit resampling results within 30-days
- l. Slug discharge control plan requirement, if required by POTW
- m. Certification statements
- n. Sampling/analysis requirements (Part 136 or alternative)
- o. Reporting of additional sampling
- p. 90-day compliance report

D. Legal Authority

- 1. Does the SUO provide the control authority adequate legal authority, consistent with 40 CFR 403.8(f)(1)?**
- 2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?**
- 3. What is the control authority's definition of SNC?
(40 CFR 403.8(f)(2)(viii))**

E. Application of Pretreatment Standards and Requirements
1. Does the CA apply all applicable pretreatment standards? (40 CFR 403.8(f)(1)(ii) and 403.8(5))
2. Has the CA evaluated the need for SIUs to develop slug discharge control plans? (40 CFR 403.8(f)(2)(vi))
F. Compliance Monitoring
1. Has the CA inspected and independently sampled each SIU at least once a year? Middle tier CIUs at least once every two years? Sample once during term of CIU control mechanism if CIU sampling waived for pollutants not present? (40 CFR 403.8(f)(2)(v), 403.12(e)(2), 403.12(e)(2))
2. Has the CA used proper sampling and analysis procedures (40 CFR Part 136) and inspection procedures? Were the procedures done with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions? (40 CFR 403.8(f)(2)(v) and (vii), 40 CFR 403.12(g)(5))
3. Has the CA kept records for three years including the following? <ul style="list-style-type: none"> a. Period compliance reports and other reports/notices b. All monitoring records including: sample date, place, method, time, personnel; analysis date, personnel, method; results c. BMP compliance documentation d. Other monitoring records (40 CFR 403.12(o))
4. Has the CA evaluated, at least once per year, whether NSCIUs continue to meet the criteria of an NSCIU? (40 CFR 403.8(f)(2)(v)(b), 403.3(v)(2))

<p>5. Has the CA required, received, and analyzed reports and other notices from SIUs?</p> <ul style="list-style-type: none"> a. Self-monitoring reports b. BMRs and 90-day compliance reports c. Compliance schedules reports d. Notice of slug loading or potential problems at POTW e. Notification of spills, bypasses, upsets, etc. f. Notification of significant change in discharge g. 24-hour notification of effluent violation h. Resampling results within 30-days i. Other reports/notifications required by the CA <p>(40 CFR 403.8(f)(2)(iv))</p>
<p>6. Have SIUs monitored to demonstrate continued compliance and re-sampled after violation(s)?</p> <p>(40 CFR 403.12(g)(1) & (2))</p>
<p>7. Has the CA ensured CIUs report on all regulated pollutants at least once every 6 months?</p> <p>(40 CFR 403.12(e)(1) & (g)(1))</p>
<p>8. Has the CA ensured non-categorical SIUs self-monitor and report at least once every 6 months with a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority?</p> <p>(40 CFR 403.12(h) & (g)(1))</p>
<p>9. Has the CA required self-monitoring reports from CIUs to be signed and certified?</p> <p>(40 CFR 403.12(b)(6), 403.12(l))</p>
<p>10. Has the CA received notification of hazardous waste discharges?</p> <p>(40 CFR 403.12(j) & (p))</p>
<p>11. Does the CA accept electronic reporting?</p> <p>(40 CFR 403.8(g) and 40 CFR Part 3)</p>
<p>G. Enforcement</p>
<p>1. Has the CA implemented its enforcement response plan (ERP)?</p> <p>(40 CFR 403.8(f)(5))</p>

2. Does the City's ERP contain the minimum elements required by 40 CFR 403.8(f)(5)?
3. Does the CA evaluate both numeric and narrative criteria for significant non-compliance (SNC) and annually publish a list of IUs in SNC? (40 CFR 403.8(f)(2)(viii))
3a. Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status.
4. Has the CA developed IU compliance schedules? (40 CFR 403.8(f)(1)(iv)(A))
5. Has the CA ensured CIU compliance within 3 years of standards effective date (or less than 3 years where required by standard)? (40 CFR 403.6(b))
6. Has the CA ensured CIUs submit complete baseline monitoring reports and 90-day compliance reports within the required time frames? (40 CFR 403.12(b) & (d))
H. Additional Evaluations
1. Hauled Waste

Focus Topics

Attachment A

Industrial User Site Visit Data Sheets

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry:					
Address of industry:					
Date of visit:			Time of visit:		
Name of inspector(s):					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
IU Permit Number:		Exp. Date:		IU Classification:	
Please provide the following documentation:					
1. Nature of operation:					
2. Number of employees		Number of shifts:		Hours of operation:	
3. Wastestream flow(s) discharged to the POTW:					
Sanitary:		Process:		Combined:	
4. Describe any current or planned significant changes in process or flow:					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed):					
Continuous flow		<input checked="" type="checkbox"/> X	Batch		Combined
6. Process area description (identify raw materials and processes used					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage):					
Any floor drains?		o		Any spill control measures?	
8. Are hazardous wastes drummed and labeled? Yes.					
9. Does the IU have hazardous waste manifests? Not reviewed.					
10. Solid waste production and disposal:					
11. Description of sample location and methods:					
Notes:					
None.					